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7 Attorney for Jaime Adalberto Espinosa-Ramos

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 JAIME ADALBERTO ESPINOSA-RAMOS,

15 Defendant.

Case No. 2:24-mj-00306-BNW

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(Fourth Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,  
18 United States Attorney, and Daniel J. Cowhig, Assistant United States Attorney, counsel for  
19 the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Heidi A. Ojeda, Assistant Federal Public Defender, counsel for Jaime Adalberto Espinosa-  
21 Ramos, that the Preliminary Hearing currently scheduled on May 21, 2024, be vacated and  
22 continued to a date and time convenient to the Court, but no sooner than three (3) weeks.

23 This Stipulation is entered into for the following reasons:

24 1. Defense counsel again checked the docket in District of Utah, and it appears  
25 that Mr. Espinosa-Ramos still has not made his initial appearance in the District of Utah.  
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1 Counsel has no way to communicate with Mr. Espinosa-Ramos to obtain his permission to  
2 file a waiver of the preliminary hearing.

3 2. A continuance is needed to allow time for counsel to speak with Mr. Espinosa-  
4 Ramos and obtain his permission to file a waiver.

5 4. Defendant is incarcerated and does not object to a continuance.

6 5. Additionally, denial of this request for continuance could result in a  
7 miscarriage of justice.

8 This is the fourth request for continuance filed herein.

9 DATED this 17th day of April, 2024.

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11 RENE L. VALLADARES  
12 Federal Public Defender

JASON M. FRIERSON  
United States Attorney

13 By /s/ Heidi A. Ojeda  
14 HEIDI A. OJEDA  
15 Assistant Federal Public Defender

By /s/ Daniel J. Cowhig  
DANIEL J. COWHIG  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JAIME ADALBERTO ESPINOSA-RAMOS,

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8

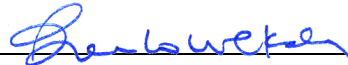
Case No. 2:24-mj-00306-BNW

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 May 21, 2024 at the hour of 11:00 a.m., be vacated and continued to June 17, 2024 at  
13 the hour of 3:00 p.m.

14 DATED this 20<sup>th</sup> day of May, 2024.

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17 UNITED STATES MAGISTRATE JUDGE  
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